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Attorneys for Plaintiff MICHAEL BISCH

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

MICHAEL BISCH, an individual,

Plaintiff,

vs.

COUNTY OF YOLO, et al.,

Defendants.

) Case No.: 2:23-cv-00455-DC-SCR

)

) **JOINT ADMINISTRATIVE MOTION**  
) **PURSUANT TO LOCAL RULE 233 FOR**  
) **BRIEFING SCHEDULE ADJUSTMENT**  
) **REGARDING DEFENDANTS' MOTION**  
) **TO DISMISS AND MOTION TO STRIKE**

)

) Dept: Courtroom 8, 13th Floor

) Judge: Hon. Dena Coggins

) Trial Date: Not Set

) Action Filed: March 10, 2023

**ADMINISTRATIVE MOTION**

Pursuant to Local Rule 233, Plaintiff Michael Bisch (“Plaintiff”) and Defendants County of Yolo, City of Davis, City of Woodland, City of West Sacramento, Angel Barajas, Oscar Villegas, Donald Saylor, Chad Rinde, Aaron Laurel, Ken Hiatt, and Michael Webb (“Defendants”) jointly move for a further revision of the briefing schedule for Defendants’ motion to dismiss (Dkt. No. 39) and motion to strike (Dkt. No. 40). The hearing for both motions is currently noticed for December 12, 2024, although the hearing itself was taken off calendar by Judge Morrison England before his retirement.

As this Court is aware, there have been three minor adjustments in connection with Defendants’ motions. First, the Plaintiff granted Defendants a modest extension to file their motions, which extension was used and Defendants filed a day before their deadline as set forth above. Second, pursuant to stipulation, which this court approved (Dkt. No. 44) on October 4, 2024, the parties this court approved revising the briefing schedule such that Plaintiff’s opposition was due on November 2, 2024, and Defendants’ reply was due on November 12, 2024. Third, pursuant to stipulation which this court approved (Dkt. No. 46), on October 27, 2024, this court approved revising the briefing schedule such that Plaintiff’s opposition is currently due on November 13, 2024, and Defendants’ reply is currently due on November 22, 2024.

As specified in the prior administrative motion, the most recent need to revise the briefing schedule was due to Plaintiff’s need for Defendant Yolo County to complete its production of documents in response to Plaintiff’s Request for Production prior to Plaintiff filing his Oppositions to the pending motions. Defense counsel previously believed Yolo County would be able to complete its production by November 7. However, due to the scope of documents requested, specifically the number of email searches that the Yolo County still needs to complete, additional time is needed to produce the requested records.

In order to provide Plaintiff what he believes he needs to oppose the motions, counsel for the parties have agree to the following:

1. Plaintiff’s new Opposition Due Date to the aforementioned motions shall be December 20, 2024;

2. Defendants' new Reply Due Date to said motions shall be January 10, 2025.

3. Hearing Date: The hearing date for said motions will remain off calendar unless the Court indicates otherwise.

For the reasons set forth above, the parties move the Court to grant this motion.

Dated: November 6, 2024

ANGELO, KILDAY & KILDUFF, LLP

By: /s/ Serena M. Warner

SERENA M. WARNER

Attorneys for Defendants COUNTY OF  
YOLO, CITY OF DAVIS, CITY OF  
WOODLAND, CITY OF WEST  
SACRAMENTO, ANGEL BARAJAS,  
OSCAR VILLEGAS, DONALD  
SAYLOR, CHAD RINDE, AARON  
LAUREL, KEN HIATT, and MICHAEL  
WEBB

Dated: November 6, 2024

ANJIV N. SINGH, A PROFESSIONAL  
LAW CORPORATION

(as authorized on 11/06/2024)

By: /s/ Sanjiv Singh

SANJIV SINGH, Attorneys for Plaintiff  
MICHAEL BISCH

Dated: November 6, 2024

INDRAJANA LAW GROUP,  
A PROFESSIONAL CORPORATION

(as authorized on 11/06/2024)

By: /s/ Michael Indra

MICHAEL INDRAJANA, Attorneys for  
Plaintiff MICHAEL BISCH

**PROPOSED ORDER**

In connection with the Parties' Joint Administrative Motion to Adjust the Briefing Schedule for Defendants' motion to dismiss (Dkt. No. 39) and motion to strike (Dkt. No. 40), which motions were filed on October 3, 2024, the Court rules as follows:

WHEREAS, the Parties have met and conferred as to the need for an adjustment to the current briefing schedule and concluded that discovery responses by Defendants will facilitate a better understanding of the issues;

WHEREAS Defendants need additional time beyond what was originally contemplated to complete its document production to Plaintiff due to the scope of the documents requested and the number of email searches required;

WHEREAS, the Parties have agreed to the following schedule as such:

1. Plaintiff's new Opposition Due Date to the aforementioned motions shall be December 20, 2024;
2. Defendants' new Reply Due Date to said motions shall be January 10, 2025.
3. Hearing Date: The hearing date for said motions will remain off calendar unless the Court indicates otherwise.

WHEREAS, the Court finds the Parties have shown good cause for the briefing schedule to be modified and the changes will not materially impact the docket or scheduling in the matter or the Court,

NOW THEREFORE it is ordered that the modified briefing schedule set forth above is adopted.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable District Court Judge Dena M. Coggins

CASE NAME: *Bisch v. County of Yolo, et al.*  
COURT: USDC, Eastern District  
CASE NO. 2:23-cv-00455-DC-SCR

**PROOF OF SERVICE**

I am a citizen of the United States, employed in the County of Sacramento, State of California. My business address is 601 University Avenue, Suite 150, Sacramento, California 95825. I am over the age of 18 years and not a party to the above-entitled action.

On November 6, 2024, I served the parties in this action listed below the following document(s) described as: **JOINT ADMINISTRATIVE MOTION PURSUANT TO LOCAL RULE 233 FOR BRIEFING SCHEDULE ADJUSTMENT REGARDING DEFENDANTS' MOTION TO DISMISS AND MOTION TO STRIKE**

The above-named document(s) were served by the following means (*specify*):

☒ BY ELECTRONIC SERVICE (to individual persons) - By electronically transmitting the document(s) listed above to the email address(es) of the person(s) set forth below, based on court order or agreement of the parties to accept service via electronic transmission. The email address I used to transmit these documents is [alynch@akk-law.com](mailto:alynch@akk-law.com) on this date. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. (CRC 2.251 or Fed.R.Civ.P.5(b)(E); Civ. Proc. section 1010.6.)

SERVICE LIST

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☒ (*Federal*) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on November 6, 2024 at Sacramento, California.

/s/ Aja Lynch

AJA LYNCH